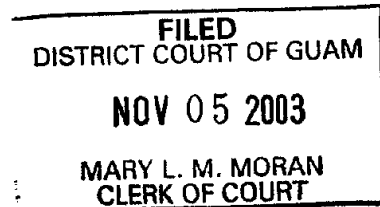


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IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,

Plaintiffs,

v.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD.,
et al.,

Defendants.

CIVIL CASE NO. CV **03-00036**

**NOTICE OF MOTION AND
MOTION BY HSBC FOR
ORDER ISSUING WRIT OF
CERTIORARI TO SUPERIOR
COURT OF GUAM FOR
RECORD IN REMOVED
ACTION
(28 U.S.C. § 1447(b))**

**TO THE PLAINTIFFS AND THEIR COUNSEL OF RECORD, ARRIOLA,
COWAN, & ARRIOLA:**

PLEASE TAKE NOTICE that Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC") hereby moves this Court for an Order issuing a writ of certiorari to the Superior Court of Guam, pursuant to 28 U.S.C. § 1447(b), requiring the Superior Court of Guam to bring all records and proceedings in the Superior Court to this Court.

ORIGINAL

Sadhwani, et al. v. Hongkong and Shanghai Banking Corporation Ltd.

Civil Case No. CV03-_____

Notice of Motion and Motion By HSBC for Order Issuing Writ of Certiorari to Superior Court of Guam for
Record in Removed Action (28 U.S.C. § 1447(b))

Page 2 of 2 pages

This Motion will be and is based upon this Notice, the Memorandum of Points
and Authorities filed herewith, and the complete records and files in this action.

Respectfully submitted this 5th day of November, 2003.

LAW OFFICES OF BRONZE & TANG
Attorneys for Defendant HSBC

By:



JACQUES A. BRONZE

RAP/nsh